



January 19, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of Modernization of Media Regulation Initiative (MB Docket No. 17-105)

Dear Ms. Dortch:

This letter is to notify you that on January 17, 2018, Lonna Thompson, Executive Vice President, Chief Operating Officer and General Counsel, of America's Public Television Stations; J. Westwood Smithers Jr., Senior Vice President and General Counsel, and Deborah Carr, Vice President of Media Strategy Operations, of the Corporation for Public Broadcasting; Gregory Lewis, Deputy General Counsel, and Joni Lupovitz, Senior Director of Public Policy, of National Public Radio; and Talia Rosen, Assistant General Counsel and Senior Director of Standards & Practices, of the Public Broadcasting Service (collectively, "Public Broadcasting") met with Michelle Carey, Mary Beth Murphy, Holly Saurer, Martha Heller, Raelynn Remy, Jonathan Mark, Lyle Elder, Brendan Holland, and Ty Bream of the Media Bureau.

Public Broadcasting expressed appreciation for the Commission's efforts to date to eliminate or modify regulations that are outdated, unnecessary, or unduly burdensome. Public Broadcasting highlighted its prior filing in the *Modernization of Media Regulation Initiative* open docket.¹ Specifically, Public Broadcasting focused on the top five priorities addressed in those comments: (i) overhaul of the noncommercial public inspection file rules in Section 73.3527, including elimination of the issues/programs list requirement; (ii) alignment of the satellite broadcast signal carriage rules in Section 76.66 with the cable rules by instituting a one-time noncommercial licensee election rather than a recurring election cycle; (iii) removal of the children's programming E/I on-screen symbol requirement in Section 73.671 from public broadcasting stations that are already not subject to the rule's reporting requirements; (iv) elimination of the station identification rule in Section 73.1201 or, alternatively, if the Commission decides to retain a station identification requirement, providing stations with the option of conveying the information via a website rather than over-the-air; and (v) re-evaluation

¹ Comments of America's Public Television Stations, Corporation for Public Broadcasting, National Public Radio Inc., and Public Broadcasting Service, *In the Matter of Modernization of Media Regulation Initiative*, MB Docket No. 17-105 (filed July 5, 2017).

of the equal employment opportunities rule in Section 73.2080 given overlapping oversight and enforcement elsewhere at the federal, state, and local level.

Public Broadcasting looks forward to continuing to work closely with the Media Bureau to evaluate and update existing regulations in order to ensure that the limited resources of local public broadcasting stations across the country are able to be put to the highest and best use.

Regards,

/s/ Talia Rosen

Talia Rosen

Assistant General Counsel and

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